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February 19, 2019

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Ranieri, et al.*, 18-cr-204 (NGG)(VMS)

Dear Judge Scanlon:

I write on behalf of defendant Clare Bronfman to respectfully request a two-day extension of time, from today until February 21, to file our submission related to the documents where privilege is in dispute between the defense and the taint team. We have been working through the disputed documents and collecting information in support of our arguments that certain of the disputed documents are privileged, but we need additional time to continue to consult with counsel for other parties and to collect information and support relevant to those arguments. In particular, we need additional time in order to make privilege determinations with respect to the immigration documents identified to the defense for the first time on February 11 and to consult with other relevant parties about those documents.

In addition, as we have informed the taint team, we are using this time to continue to consult with counsel for NXIVM and where needed other parties, to try to reduce the number of documents that we need to litigate.

I have consulted with AUSA Philip Pilmar who informed me that the government consents to this request, with an equivalent extension of the government's time to reply until February 27th.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar (via ECF)
AUSAs Shannon Jones, Philip Pilmar (via email)
All defense counsel (via ECF)